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*Attorneys for Specially Appearing
Defendant Feras Antoon*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

K.A.,

Plaintiff

V.

MINDGEEK S.A.R.L. a foreign entity; MG FREESITES, LTD., a foreign entity; MINDGEEK USA INCORPORATED, a Delaware corporation; MG PREMIUM LTD, a foreign entity; MG GLOBAL ENTERTAINMENT INC., a Delaware corporation; 9219-1568 QUEBEC, INC., foreign entity; BERND BERGMAIR, a foreign individual; FERAS ANTOON, a foreign individual; DAVID TASSILLO, a foreign individual; VISA INC., a Delaware corporation; REDWOOD CAPITAL MANAGEMENT, LLC, a Delaware limited liability company; REDWOOD DOE FUNDS 1-7; COLBECK CAPITAL MANAGEMENT, LLC, a Delaware limited liability company; COLBECK DOE FUNDS 1-3.

Defendants.

Case No. 2:24-cv-4786-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 7, 2024

Trial Date: not set

**DECLARATION OF JASON BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION FOR LEAVE TO FILE UNDER SEAL**

1 N.L.,
2 v.
3 Plaintiff,
4
5 MINDGEEK S.A.R.L. a foreign entity;
6 MG FREESITES, LTD., a foreign entity;
7 MINDGEEK USA INCORPORATED, a
8 Delaware corporation; MG PREMIUM
9 LTD, a foreign entity; MG GLOBAL
10 ENTERTAINMENT INC., a Delaware
11 corporation; 9219-1568 QUEBEC, INC.,
12 foreign entity; BERND BERGMAIR, a
13 foreign individual; FERAS ANTOON, a
14 foreign individual; DAVID TASSILLO, a
15 foreign individual; VISA INC., a Delaware
16 corporation; REDWOOD CAPITAL
17 MANAGEMENT, LLC, a Delaware
18 limited liability company; REDWOOD
19 DOE FUNDS 1-7; COLBECK CAPITAL
20 MANAGEMENT, LLC, a Delaware
21 limited liability company; COLBECK
22 DOE FUNDS 1-3,
23
24 Defendants.

25 L.T.,
26 v.
27 Plaintiff,
28
29 MINDGEEK S.A.R.L. a foreign entity;
30 MG FREESITES, LTD., a foreign entity;
31 MINDGEEK USA INCORPORATED, a
32 Delaware corporation; MG PREMIUM
33 LTD, a foreign entity; MG GLOBAL
34 ENTERTAINMENT INC., a Delaware
35 corporation; 9219-1568 QUEBEC, INC.,
36 foreign entity; BERND BERGMAIR, a
37 foreign individual; FERAS ANTOON, a
38 foreign individual; DAVID TASSILLO, a
39 foreign individual; VISA INC., a Delaware
40 corporation; REDWOOD CAPITAL
41 MANAGEMENT, LLC, a Delaware
42 limited liability company; REDWOOD
43 DOE FUNDS 1-7; COLBECK CAPITAL
44 MANAGEMENT, LLC, a Delaware
45 limited liability company; COLBECK
46 DOE FUNDS 1-3,
47
48 Defendants.

49 Case No. 2:24-cv-04788-WLH-
50 ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

51 Case No. 2:24-cv-04791-WLH-
52 ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

1 T.C.,

2 v.

3 Plaintiff,

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 X.N.,

24 v.

25 Plaintiff,

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
1 Delaware corporation; MG PREMIUM
2 LTD, a foreign entity; MG GLOBAL
3 ENTERTAINMENT INC., a Delaware
4 corporation; 9219-1568 QUEBEC, INC.,
5 foreign entity; BERND BERGMAIR, a
6 foreign individual; FERAS ANTOON, a
7 foreign individual; DAVID TASSILLO, a
8 foreign individual; VISA INC., a Delaware
9 corporation; REDWOOD CAPITAL
10 MANAGEMENT, LLC, a Delaware
11 limited liability company; REDWOOD
12 DOE FUNDS 1-7; COLBECK CAPITAL
13 MANAGEMENT, LLC, a Delaware
14 limited liability company; COLBECK
15 DOE FUNDS 1-3,

16 Defendants.

Case No. 2:24-cv-04795-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE
UNDER SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

Case No. 2:24-cv-04800-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE
UNDER SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

1 N.Y.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 J.C.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
29 Delaware corporation; MG PREMIUM
30 LTD, a foreign entity; MG GLOBAL
31 ENTERTAINMENT INC., a Delaware
32 corporation; 9219-1568 QUEBEC, INC.,
33 foreign entity; BERND BERGMAIR, a
34 foreign individual; FERAS ANTOON, a
35 foreign individual; DAVID TASSILLO, a
36 foreign individual; VISA INC., a Delaware
37 corporation; REDWOOD CAPITAL
38 MANAGEMENT, LLC, a Delaware
39 limited liability company; REDWOOD
40 DOE FUNDS 1-7; COLBECK CAPITAL
41 MANAGEMENT, LLC, a Delaware
42 limited liability company; COLBECK
43 DOE FUNDS 1-3,

44 Defendants.

Case No. 2:24-cv-4801-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 7, 2024

Trial Date: not set

Case No. 2:24-cv-04971-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 12, 2024

Trial Date: not set

1 W.L.,

2 v.

3 Plaintiff,

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 C.S.,

24 v.

25 Plaintiff,

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
1 Delaware corporation; MG PREMIUM
2 LTD, a foreign entity; MG GLOBAL
3 ENTERTAINMENT INC., a Delaware
4 corporation; 9219-1568 QUEBEC, INC.,
5 foreign entity; BERND BERGMAIR, a
6 foreign individual; FERAS ANTOON, a
7 foreign individual; DAVID TASSILLO, a
8 foreign individual; VISA INC., a Delaware
9 corporation; REDWOOD CAPITAL
10 MANAGEMENT, LLC, a Delaware
11 limited liability company; REDWOOD
12 DOE FUNDS 1-7; COLBECK CAPITAL
13 MANAGEMENT, LLC, a Delaware
14 limited liability company; COLBECK
15 DOE FUNDS 1-3,

16 Defendants.

Case No. 2:24-cv-04977-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

Case No. 2:24-cv-04992-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

1 S.O.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 L.S.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
29 Delaware corporation; MG PREMIUM
30 LTD, a foreign entity; MG GLOBAL
31 ENTERTAINMENT INC., a Delaware
32 corporation; 9219-1568 QUEBEC, INC.,
33 foreign entity; BERND BERGMAIR, a
34 foreign individual; FERAS ANTOON, a
35 foreign individual; DAVID TASSILLO, a
36 foreign individual; VISA INC., a Delaware
37 corporation; REDWOOD CAPITAL
38 MANAGEMENT, LLC, a Delaware
39 limited liability company; REDWOOD
40 DOE FUNDS 1-7; COLBECK CAPITAL
41 MANAGEMENT, LLC, a Delaware
42 limited liability company; COLBECK
43 DOE FUNDS 1-3,

44 Defendants.

Case No. 2:24-cv-04998-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

Case No. 2:24-cv-05026-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 14, 2024

Trial Date: not set

1 W.P.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 A.K.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
29 Delaware corporation; MG PREMIUM
30 LTD, a foreign entity; MG GLOBAL
31 ENTERTAINMENT INC., a Delaware
32 corporation; 9219-1568 QUEBEC, INC.,
33 foreign entity; BERND BERGMAIR, a
34 foreign individual; FERAS ANTOON, a
35 foreign individual; DAVID TASSILLO, a
36 foreign individual; VISA INC., a Delaware
37 corporation; REDWOOD CAPITAL
38 MANAGEMENT, LLC, a Delaware
39 limited liability company; REDWOOD
40 DOE FUNDS 1-7; COLBECK CAPITAL
41 MANAGEMENT, LLC, a Delaware
42 limited liability company; COLBECK
43 DOE FUNDS 1-3,

44 Defendants.

Case No. 2:24-cv-05185-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 20, 2024

Trial Date: not set

Case No. 2:24-cv-05190-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 20, 2024

Trial Date: not set

1 J.L.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 MASTER FUND, LTD, a foreign
entity; MANUEL 2018, LLC, a
Delaware limited liability company;
GINOGERUM, LLC, a Delaware
limited liability company; WHITE
HATHAWAY OPPORTUNITY, LLC,
a Delaware limited liability company, CB
MEDIA VENTURES LLC, a Delaware
limited liability company; CB AGENCY
SERVICES, LLC, a Delaware limited
liability company; and CB
PARTICIPATIONS SPV, LLC, a
Delaware limited liability company,

19 Defendants.

20 Case No. 2:24-cv-07046-WLH-
21 ADS

22 **DECLARATION OF JASON
23 BROWN IN SUPPORT OF
24 PLAINTIFFS' APPLICATION
25 FOR LEAVE TO FILE UNDER
26 SEAL MATERIALS
27 RELATED TO OMNIBUS
28 OPPOSITION**

29 Hearing Date: January 31, 2025

30 Hearing Time: 1:30 p.m.

31 Courtroom: 9B

32 Judge: Hon. Wesley Hsu

33 Complaint Filed: August 20, 2024

34 Trial Date: not set

I, Jason Brown, Esq., hereby state to the best of my personal knowledge and belief:

1. I am a partner at the law firm of Cohen & Gresser LLP, attorneys of record in the above-referenced actions for specially-appearing Defendant Feras Antoon. I have been granted permission by this Court to appear *pro hac vice* as counsel for Mr. Antoon in these actions.

A. Confidential Material

2. I submit this Declaration in support of the December 12, 2024 Application for Leave to File Under Seal Materials Related to Omnibus Opposition (ECF No. 95) (the “Application”) filed by Plaintiff in *K.A. v. MindGeek S.a.r.l.*, Case No. 24-cv-4786-WLH-ADS, and by Plaintiffs in the 13 additional related lawsuits before this court, *see* ECF No. 52, Ex. 1 (collectively “Plaintiffs”) which seeks permission to seal material previously designated as “Confidential” or “Highly Confidential” pursuant to the Amended Stipulated Protective Order (the “Protective Order”) entered by the Court on December 13, 2024, Dkt. 516, in the related case, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-4920-WLH-ADS (the “Fleites Action”).

3. Mr. Antoon supports the Application to the extent it seeks leave to file under seal material that (a) Mr. Antoon produced in discovery in the Fleites Action and designated as “Confidential” or “Highly Confidential” pursuant to the Protective Order (together, the “Confidential Material”), or (b) has been referenced in either (i) Plaintiffs’ December 12, 2024 Omnibus Opposition to Defendants’ Motions to Dismiss (the “Opposition”) (ECF No. 93), or (ii) the December 12, 2024 Declaration of Michael J. Bowe in Support of Plaintiffs’ Opposition to Defendants’ Motions to Dismiss (the “Bowe Declaration”) (ECF No. 92) and the exhibits attached thereto.

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4. Mr. Antoon further supports the Application to the extent it seeks leave to file under seal Confidential Material that was both (a) referenced in either the Opposition or the Bowe Declaration, and (b) publicly filed on the docket in the form of a document containing redacted Confidential Material proposed to be filed under seal.

5. The Confidential Material reflects confidential information concerning Mr. Antoon's (i) assets, including compensation paid for economic interests in MindGeek S.a.r.l.; (ii) salary, bonus and/or dividend payments received while employed as the CEO of 9219-1568 Quebec, Inc. ("9219-1568 Inc."); (iii) other personally identifiable information; and (iv) rights received and exercised in connection with economic interests in MindGeek S.a.r.l.

B. Standard for Sealing

6. Public access to judicial records may be "denied where court files might [] become a vehicle for improper purposes," including to "gratify private spite or promote public scandal" or to "harm a litigant's competitive standing." *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598 (1978) (internal quotation marks omitted). And the common law right of access to judicial records may be overridden upon a showing of "sufficiently compelling reasons" to restrict access. *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003).

7. A party seeking leave to seal confidential information in response to dispositive motions, like the Opposition, must "articulate []compelling reasons supported by specific factual findings" that outweigh the public right of access. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006) (internal quotation marks omitted). Upon a showing of compelling reasons, the court must conscientiously balance the competing interests of the public and the party seeking leave to file under seal. *Id.* at 1179.

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3 8. Compelling reasons to justify sealing include safeguarding the privacy
4 of “personally identifiable information including salaries.” Order Re: Defs.’
5 Renewed Appl. for Leave to File Under Seal, *United States ex rel. IONM LLC v.*
6 *Univ. of S. California*, No. 2:18-CV-08311 (WLH) (AS), (C.D. Cal. Aug. 12,
7 2024), ECF No. 348, at *2 (internal quotation marks omitted) (granting application
8 to seal employment records containing personally identifiable information such as
names, salaries, and terms of employment and financial and proprietary data
9 implicating the privacy interests of the employer and its individual employees).
10 See also *Richter v. Oracle Am., Inc.*, No. 22-CV-04795-BLF, 2023 WL 5663217,
11 at *2 (N.D. Cal. Aug. 30, 2023) (granting motion to seal personal financial
12 information, finding that compelling reasons exist to seal and prevent harmful use
13 of the information); *Gomo v. NetApp, Inc.*, No. 1:17-CV-02990 (BLF), 2019 WL
14 1170775, at *3 (N.D. Cal. Mar. 13, 2019) (sealing exhibits containing non-public,
15 confidential information regarding defendant corporation’s compensation plan and
16 executives).

17 9. Courts have also found compelling reasons to seal records reflecting
18 business transactions, corporate structure, compensation practices, and finances,
19 the public disclosure of any of which could harm a party’s competitive standing.
20 See, e.g., *Bold Ltd. v. Rocket Resume, Inc.*, No. 5:22-CV-01045 (BLF), 2024 WL
21 1329921, at *2 (N.D. Cal. Mar. 27, 2024) (“Compelling reasons exist to seal
22 confidential business information, including non-public information about a
23 company’s business strategy, business transactions, corporate structure, and
24 finances.”).

25 **C. Conclusion**

26 10. The Opposition and Exhibits 3 and 18 to the Bowe Declaration
27 contain sensitive non-public information implicating either (i) Mr. Antoon’s
28 personally identifiable information, including financial information or rights in

connection with economic interest, or (ii) the MindGeek Defendants' internal business strategy or practices, transactions, financial information, or corporate structure.

11. Accordingly, Mr. Antoon supports Plaintiffs' Application seeking leave to seal and/or redact this information from the public record as specified in the below chart.

Document	Material to be Sealed	Basis for Sealing
Exhibit 3 (containing excerpts to the June 14, 2023 deposition of Mr. Antoon) to the Declaration of Michael J. Bowe in Support of Plaintiffs' Opposition to Defendants' Motions to Dismiss (ECF No. 92-3)	Sealed in its entirety	Mr. Antoon's personal financial information or rights in connection with economic interest; other personally identifiable information; Defendant MindGeek's business strategy and internal structure.
Exhibit 18 (Mr. Antoon's September 22, 2022 Responses and Objections to Plaintiff's First Set of Interrogatories) to the Declaration of Michael J. Bowe in Support of Plaintiffs' Opposition to Defendants' Motions to Dismiss (ECF No. 92-18)	Page 6, Lines 3-21; Page 7, Lines 14-28; Page 8, Lines 1-5; and Page 9, Lines 14-23.	Mr. Antoon's personally identifiable information; Defendant MindGeek's business strategy.

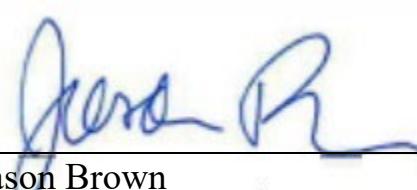
Document	Material to be Sealed	Basis for Sealing
Plaintiffs' Omnibus Opposition to Defendants' Motions to Dismiss (ECF No. 93)	Page 60, Lines 12-15, 17-28; Page 61, Lines 1-3, 14-28; Page 62, Lines 1-2; Page 70, Lines 7-12, 14-20, 23-28; Page 71, Lines 1-9; and Page 72, Lines 5-10.	Defendant MindGeek's business strategy, transactions, finances, and structure; Mr. Antoon's personal financial information or rights in connection with economic interest.

12. Mr. Antoon's request to seal is narrowly tailored. A less restrictive alternative to sealing is not sufficient because the entirety of the information sought to be sealed discloses the Confidential Material described above.

13. Accordingly, Mr. Antoon respectfully requests that the Court grant the Application.

14. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

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20 Executed on: December 17, 2024

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Jason Brown
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New York, New York 10022
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